

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

GILBERT LANTINI,

Plaintiff,

v.

OCWEN LOAN SERVICING, LLC,

Defendant.

C.A. No. 1:18-cv-00674-WES-LDA

**JOINT MOTION TO EXTEND THE DEADLINES TO COMPLETE FACT
DISCOVERY AND FILE DISPOSITIVE MOTIONS BY SIXTY DAYS**

Plaintiff Gilbert Lantini (“Plaintiff”) and Defendant Ocwen Loan Servicing, LLC (“Defendant”) (collectively the “Parties”), through their undersigned counsel, respectfully request that this Court extend the deadlines to complete fact discovery and file dispositive motions by sixty (60) days. In support, the Parties state as follows:

1. This is the Parties’ first request to extend the deadlines to complete fact discovery and to file dispositive motions.
2. The requested extensions will not unduly delay this litigation or prejudice either party.
3. Plaintiff filed this action on or around December 13, 2018.
4. Defendant answered the Complaint on or around February 15, 2019.
5. On June 14, 2019, Defendant issued interrogatories, requests for production, and a notice for Plaintiff’s deposition.
6. Plaintiff asked the Court for multiple extensions of time to respond to Defendant’s interrogatories and requests for production, which the Court granted. Plaintiff’s last extension

required him to respond to Defendant's interrogatories and requests for production by October 18, 2019. Defendant has not yet received Plaintiff's responses but anticipates receiving them in the near future.

7. As a result Defendant will need to conduct Plaintiff's deposition at a later date after receipt of Plaintiff's responses to its discovery.

8. In addition, the Parties have recently have engaged in settlement discussions that may potentially resolve this entire matter and would like more time to continue these discussions, while potentially avoiding further discovery related expenses while they do so.

9. To allow the Parties the necessary time to complete any remaining written discovery and/or oral discovery, including Plaintiff's deposition as mentioned above, and to continue settlement discussions without incurring further expenses, they jointly request that the Court extend the deadline to complete fact discovery from November 8, 2019 to January 8, 2020 and extend the deadline to file dispositive motions from December 9, 2019 to February 10, 2020.

Wherefore, the Parties jointly request that this Court extend the deadline for the Parties to complete fact discovery to January 8, 2020 and the deadline for them to file dispositive motions by February 10, 2010.

Respectfully submitted,

By Plaintiff's Counsel,

/s/ John B. Ennis

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By Defendant's Counsel,

/s/ Joseph P. Murphy

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CERTIFICATE OF SERVICE

I, John B. Ennis, an attorney, certify that on October 30, 2019, caused to be served a copy of the foregoing **JOINT MOTION TO EXTEND THE DEADLINES TO COMPLETE FACT DISCOVERY AND FILE DISPOSITIVE MOTIONS BY SIXTY DAYS** by: depositing same in the U.S. Mail box, prior to 5:00 p.m., postage prepaid; messenger delivery; UPS; facsimile; email; or electronically via the Case Management/Electronic Case Filing system (“ECF”), as indicated below.

- ☒ CM/ECF
- ☐ Facsimile
- ☐ UPS
- ☐ Regular U.S. Mail
- ☐ Messenger
- ☐ E-Mail

To: *All parties of record*

/s/ John B. Ennis

John B. Ennis